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**UNITED STATES DISTRICT COURT  
FOR  
THE NORTHERN MARIANA ISLANDS**

UNITED STATES OF AMERICA, ) CRIMINAL CASE NO. 08-00014

Plaintiff, ) DEFENDANT LAWRENCE KALEN'S  
 ) MOTION TO COMPEL GOVERNMENT TO  
 ) GIVE NOTICE OF INTENTION TO USE  
RY SABLAR, KALEN,) EVIDENCE OF OTHER CRIMES,  
 ) WRONGS OR ACTS.

Defendants. ) Time: 9:00 a.m.  
 ) Date: June 5, 2008  
 ) Judge: Munson

Comes now Defendant Lawrence Kalen and moves for an order directing the government to provide notice of its intent to use evidence of prior arrests, convictions, or bad acts. This motion is made under Fed. R. Evid. 404(b) and Fed. R. Crim. P. 16.

In addition, Defendant moves for production of all evidence, documents, records of judgments and convictions, photographs and tangible evidence, and information pertaining to any prior arrests and convictions or prior bad acts. Evidence of prior record is available under Fed. R. Crim. P. 16(a)(1)(B). Evidence of prior similar acts is discoverable under Fed. R. Crim. P. 16(a)(1)(C) and Fed. R. Evid. 404(b) and 609.

Dated this 16<sup>th</sup> day of May, 2008.

  
BRUCE BERLINE  
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